# **Statement of Basis of the Federal Operating Permit**

DCP Midstream, LP

Site Name: Gulf Plains Gas Plant Physical Location: 7202 County Road 16 Nearest City: Bishop County: Nueces

> Permit Number: O2590 Project Type: Renewal

Standard Industrial Classification (SIC) Code: 1321 SIC Name: Natural Gas Liquids

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: January 22, 2016

# Operating Permit Basis of Determination

#### **Permit Area Process Description**

The Gulf Plains Gas Plant is a 170 million standard cubic feet per day natural gas processing plant that serves to extract natural gas liquids for saleable products and produce residue gas for pipeline distribution and sales. Wet field gas enters several inlet separators to remove entrained hydrocarbon liquids and produced water from the gas stream. Condensate and produced water are routed to additional separation vessels. Light hydrocarbon vapors are flashed off, recompressed and returned to the plant inlet. Produced water is routed to atmospheric storage tanks where it is stored and periodically removed by tanker trucks for off-site disposal. Condensate is stabilized and then sent via pipeline to sales or loaded to trucks through a truck loadout system.

After inlet separation, gas is routed to the Amine system. Gas enters the Amine Contactor (V-740) where CO<sub>2</sub> and H<sub>2</sub>S are removed by a counter flowing stream of lean amine solvent. Treated sweet gas exits the top of the amine contactor, while rich amine solvent containing removed CO<sub>2</sub> and H<sub>2</sub>S exits the bottom of the contactor. Rich amine is routed to a flash tank to remove light hydrocarbon vapors and then to the amine regenerator where stripping steam is used to drive off CO<sub>2</sub>, H<sub>2</sub>S and some entrained VOCs in the amine stream, producing an acid gas stream that exits the top of the stripper column. Regenerated lean amine exits through the stripper bottom. The acid gas stream and flash gas are both routed to the thermal oxidizer (TO-1) for emissions control. The utility flare (FLARE-2) also serves as a backup control device for TO-1.

Sweet gas from the top of the amine contactor is routed to one of two glycol contactors (V-601 and V-602) for dehydration. Inlet gas is contacted with a liquid stream of lean triethylene glycol (TEG) solvent to remove water. Dry gas exits the top of the contactors. Water saturated rich glycol exits the bottom of the contactors and enters a flash tank to remove light hydrocarbon vapors. The flash gas stream is routed to TO-1 for emissions control. Rich TEG is then routed to the Glycol still where it is heated to drive off water and regenerate the glycol solvent. The glycol still overhead vapor is routed to a condenser to remove liquid water. The remaining vapor stream is then routed to TO-1 for emission control. In the event that the thermal oxidizer is down due to low temperature or upset, the vapor stream is routed to FLARE-2 for emissions control. Further dehydration is achieved through the use of three molecular sieve dehydration beds.

Treated dry gas is routed to the cryogenic section of the plant for Natural Gas Liquids (NGL) recovery. Treated dry gas is chilled with a combination of a turbo-expander, heat exchangers, and supplemental refrigeration provided by the propane refrigeration system. Chilled gas enters the demethanizer tower where it is separated into residue gas and NGL. Residue gas is recompressed and exits the plant via pipeline. NGL is further fractionated into saleable products and exits the plant via pipeline or via truck load-out.

#### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

#### **Major Source Pollutants**

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, NOX, HAPS, CO
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# **Reading State of Texas's Federal Operating Permit**

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - o New Source Review Authorization Requirements
  - o Compliance Requirements
  - o Protection of Stratosphere Ozone
  - o Permit Location
  - o Permit Shield (30 TAC § 122.148)
- Attachments
  - o Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list

#### **General Terms and Conditions**

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

#### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying

information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception-Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

# Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

# Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

#### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CAIR (Clean Air Interstate Rule)	No

# **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

# **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.

- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

#### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html">www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html</a>.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at

www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

# **Determination of Applicable Requirements**

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
114	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	
115	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	
116A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
117	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	
118	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	
119B	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	
125A	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Manufactured Date = Date of manufacture is on or after July 1, 2010.	
			Test Cell = The SI ICE is not being tested at an engine test cell/stand.	
			Certified = Purchased a non-certified SI ICE.	
			National Security = The SI ICE is not eligible for exemption due to national security.	
			Temp Replacement = The SI ICE is not acting as a temporary replacement.	
			Horsepower = Maximum engine power greater than or equal to 1350 HP.	
			Fuel = SI ICE that uses natural gas.	
			Service = SI ICE is a non-emergency engine.	
			Commencing = SI ICE that is commencing new construction.	
125A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR $\S$ 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
			Control Technique = Oxidation catalyst	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing carbon monoxide emissions from the stationary RICE	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.	
130B	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Continuous parameter monitoring system	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	
131A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-003	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Manufacture Date = The stationary RICE was manufactured prior to January 1, 2008.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.	
132	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
132	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.	
			Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Control Technique = Non-selective catalytic reduction	
			Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.	
			Emission Limitation = Reducing formaldehyde emission by 76% or greater	
			Monitoring System = Monitoring system other than a CPMS or CEMS	
			Service Type = Normal use.	
			Stationary RICE Type = 4 stroke spark ignited rich burn engine	
AST-1400	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs	Alternate Control Requirement = Not using an alternate method for	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
AST-1701	30 TAC Chapter 115, Storage of VOCs	R5112-001	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a submerged fill pipe	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
AST-1702	30 TAC Chapter 115, Storage of	R5112-002	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
	VOCs		Tank Description = Tank using a submerged fill pipe	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
AST-505	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs	Storage of Alternate Control Requirement	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
AST-660	30 TAC Chapter 115, Storage of	R5112-001	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	VOCs		compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
AST-780	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
AST-804	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
AST-805A	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
AST-806	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
AST-812	30 TAC Chapter 115, Storage of VOCs	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
			Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a submerged fill pipe	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
			Product Stored = Crude oil and/or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 40,000 gallons	
AST-812	40 CFR Part 60, Subpart Kb	60KB-002	Product Stored = Petroleum (other than crude oil) or condensate stored, processed, and/or treated prior to custody transfer	
			Storage Capacity = Capacity is less than or equal to 420,000 gallons (1,589,874 liters)	
AST-813A	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a submerged fill pipe	
		_	True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = Crude oil and/or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 40,000 gallons	
AST-814	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**	
			compliance with applicable control requirements or exemption criteria.		
			Tank Description = Tank using a submerged fill pipe		
			True Vapor Pressure = True vapor pressure is less than 1.0 psia		
			Product Stored = VOC other than crude oil or condensate		
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons		
AST-814	40 CFR Part 60, Subpart Kb	60KB-002	Product Stored = Petroleum (other than crude oil) or condensate stored, processed, and/or treated prior to custody transfer		
			Storage Capacity = Capacity is less than or equal to 420,000 gallons (1,589,874 liters)		
DETERGENT	115, Storage of	R5112-001	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.		
	VOCs		Product Stored = Other than crude oil, condensate, or VOC		
DIESEL	30 TAC Chapter 115, Storage of	R5112-001	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.		
	VOCs	Cs	Product Stored = VOC other than crude oil or condensate		
			Storage Capacity = Capacity is less than or equal to 1,000 gallons		
T103	30 TAC Chapter 115, Storage of VOCs	R5112-001	Today's Date = Today's date is March 1, 2013 or later.		
			Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.		
			Product Stored = Other than crude oil, condensate, or VOC		
TANK 11	30 TAC Chapter	15, Storage of	Today's Date = Today's date is March 1, 2013 or later.		
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.		
			Tank Description = Tank using a submerged fill pipe		
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia		
				Product Stored = VO	Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons		
TANK-5	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.		
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.		
			Tank Description = Tank using a submerged fill pipe		
			True Vapor Pressure = True vapor pressure is less than 1.0 psia		
			Product Stored = VOC other than crude oil or condensate		
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons		
TANK-8	30 TAC Chapter	R5112-001	Today's Date = Today's date is March 1, 2013 or later.		
	115, Storage of VOCs	Storage of Alternate Control Requirement - Not using an alternate method for demonstrating and decumenting continuous	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.		
			Product Stored = Other than crude oil, condensate, or VOC		

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
TANK-8	40 CFR Part 60, Subpart K	60K-001	Construction/Modification Date = On or before June 11, 1973	
TANK-9	30 TAC Chapter 115, Storage of VOCs	R5112-001	Today's Date = Today's date is March 1, 2013 or later.  Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = Other than crude oil, condensate, or VOC	
TP-7280	30 TAC Chapter 115, Storage of VOCs	R5112-001	Today's Date = Today's date is March 1, 2013 or later.  Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = Gasoline from a storage container in motor vehicle fuel dispensing service (as defined in 30 TAC Chapter 115)  Storage Capacity = Capacity is less than or equal to 1,000 gallons	
TP-7292	30 TAC Chapter 115, Storage of VOCs	R5112-001	Today's Date = Today's date is March 1, 2013 or later.  Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = Gasoline from a storage container in motor vehicle fuel dispensing service (as defined in 30 TAC Chapter 115)  Storage Capacity = Capacity is less than or equal to 1,000 gallons	
BUT-LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.  Product Transferred = Liquefied petroleum gas (LPG), crude oil, or condensate.  Transfer Type = Only loading.	
GAS-LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L2	Chapter 115 Control Device Type = Vapor control system with a flare.  Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.  Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.  Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.  Transfer Type = Only loading.  True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.  Daily Throughput = Loading greater than or equal to 20,000 gallons per day.  Control Options = Vapor control system that maintains a control efficiency of at least 90%.	
GAS- UNLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-L3	Chapter 115 Control Device Type = Vapor control system with a flare.  Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.	
			Transfer Type = Only unloading.	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.	
			Daily Throughput = Loading greater than or equal to 20,000 gallons per day.	
			Control Options = Vapor control system that maintains a control efficiency of at least 90%.	
PROP-LOAD	30 TAC Chapter 115, Loading and	R5211-L1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Liquefied petroleum gas (LPG), crude oil, or condensate.	
			Transfer Type = Only loading.	
1103	40 CFR Part 60,	60DC-002	Construction/Modification Date = After June 9, 1989 but on or before February 28, 2005.	Reporting citation §60.48c(j)
	Subpart Dc		PM Monitoring Type = No particulate monitoring.	was removed because this citation is not needed for
			Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).	natural gas-fired heaters.
			SO <sub>2</sub> Inlet Monitoring Type = Fuel certification (or maintaining receipts).	
			Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.	
			SO <sub>2</sub> Outlet Monitoring Type = No SO <sub>2</sub> monitoring.	
			Heat Input Capacity = Heat input capacity is greater than or equal to 30 MMBtu/hr (8.7 MW) but less than or equal to 75 MMBtu/hr (22 MW).	
			Technology Type = None.	
			D-Series Fuel Type = Natural gas.	
		ACF Option - SO2	ACF Option - SO2 = Other ACF or no ACF.	
			ACF Option - PM = Other ACF or no ACF.	
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
1103	40 CFR Part 63, Subpart DDDDD	63DDDDD-001	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010.	
202	40 CFR Part 60,	60DC-001	Construction/Modification Date = After February 28, 2005.	Reporting citation §60.48c(j)
	Subpart Dc		PM Monitoring Type = No particulate monitoring.	was removed because this citation is not needed for
			Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).	natural gas-fired heaters.
			SO <sub>2</sub> Inlet Monitoring Type = Fuel certification (or maintaining receipts).	
			Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			SO2 Outlet Monitoring Type = No SO <sub>2</sub> monitoring.	
			Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).	
			Technology Type = None.	
			D-Series Fuel Type = Natural gas.	
			ACF Option - SO2 = Other ACF or no ACF.	
			ACF Option - PM = Other ACF or no ACF.	
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
202	40 CFR Part 63, Subpart DDDDD	63DDDD-001	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010.	
FLARE-1	30 TAC Chapter	R1111-001	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.	
	111, Visible Emissions		Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	
	Limisolons		Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
FLARE-1	40 CFR Part 60,	60A-001	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.	
	Subpart A		Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).	
			Flare Assist Type = Air-assisted	
			Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)	
			Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).	
FLARE-2	30 TAC Chapter	R1111-002	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.	
	111, Visible Emissions		Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	
			Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
FLARE-2	40 CFR Part 60,	60A-002	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.	
	Subpart A		Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).	
			Flare Assist Type = Air-assisted	
			Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)	
			Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).	
PRO- AMINE-I	30 TAC Chapter 112, Sulfur Compounds	R2-002	Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery.	
PRO-	40 CFR Part 60,	60LLL-002	Onshore = The sweetening unit is located onshore at a gas processing plant.	
AMINE-I	Subpart LLL		Construction Date = After January 20, 1984 and on or before August 23, 2011.	
			Acid Gas Vented = Acid gas is vented (acid gas is not completely reinjected into oil- or gas-bearing strata or is otherwise released into the atmosphere [burning is considered to be a release into the atmosphere]).	
			Design Capacity = Design capacity is less than 2 long tons/day.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
111A	40 CFR Part 60,	60GG-001	NOx Control Method = No NO <sub>x</sub> control method is used.	
	Subpart GG		Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).	
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.	
			NOx Allowance = The owner or operator is not electing to use a $NO_x$ allowance in determining emission limits in 40 CFR § 60.332(a).	
			NOx Monitoring Method = No continuous monitoring system is used.	
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.	
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.	
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).	
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.	
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.	
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.	
112B	40 CFR Part 60,	60GG-005	NOx Control Method = No NO <sub>x</sub> control method is used.	
	Subpart GG		Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).	
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.	
			NOx Allowance = The owner or operator is not electing to use a $NO_x$ allowance in determining emission limits in 40 CFR § 60.332(a).	
			NOx Monitoring Method = No continuous monitoring system is used.	
		Turbine Cycle = Unit does not recover heat water or generate steam.  Fuel Type Fired = Natural gas meeting the Gubpart GG Service Type = Type of service Gutility generation.	Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.	
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.	
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).	
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.	
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.	
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.	
113	40 CFR Part 60,	60GG-003	$NOx$ Control Method = $No$ $NO_x$ control method is used.	
	Subpart GG		Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).	
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.	
			NOx Allowance = The owner or operator is not electing to use a NO $_x$ allowance in determining emission limits in 40 CFR § 60.332(a).	
			NOx Monitoring Method = No continuous monitoring system is used.	
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.	
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).	
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.	
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.	
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.	
120	40 CFR Part 60, Subpart GG	60GG-004	Duct Burner = The turbine is part of a combined cycle turbine system equipped with supplemental heat (duct burner).	
			$NOx$ Control Method = $No$ $NO_x$ control method is used.	
			Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).	
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.	
			NOx Allowance = The owner or operator is not electing to use a $NO_x$ allowance in determining emission limits in 40 CFR § 60.332(a).	
			NOx Monitoring Method = No continuous monitoring system is used.	
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.	
			Turbine Cycle = Unit recovers heat from the gas turbine exhaust to heat water or generate steam.	
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).	
			Subpart GG Service Type = Electric utility generation.	
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.	
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.	
170A	40 CFR Part 60,	60GG-003	$NOx$ Control Method = $No$ $NO_x$ control method is used.	
	Subpart GG		Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).	
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.	
			NOx Allowance = The owner or operator is not electing to use a $NO_x$ allowance in determining emission limits in 40 CFR § 60.332(a).	
			NOx Monitoring Method = No continuous monitoring system is used.	
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.	
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.	
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).	
			Subpart GG Service Type = Electric utility generation.	
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.	
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.	
FUG	40 CFR Part 60, Subpart KKK	60KKK-001	2% Valves Leaking = The owner or operator is not electing to comply with an allowable percentage of valves leaking equal to or less than 2.0 percent.	
			Closed Vent Systems = Closed-vent systems addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Facility Type = Affected facility is the group of all equipment except compressors within a process unit.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Heavy Liquid Service = Pump in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Light Liquid Service = Pressure relief device in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Open-Ended Valves or Lines = Open-ended valves or lines addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Vacuum Service = No component in vacuum service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Vapor Recovery System = No vapor recovery system addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			AMEL = Not using alternate means of emission limitation.	
			Complying With § 60.482-10 = Complying with 40 CFR 60.482-10.	
			Construction/Modification Date = After January 20, 1984 and on or before August 23, 2011.	
			Gas/Vapor Service = Valves in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Non-VOC or Non-Wet Gas Service = Component in non-VOC or non-wet gas service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			AMEL = Not using alternate means of emission limitation.	
			Facility Covered by 40 CFR Part 60, Subparts VV or GGG = Facility not covered by NSPS Subpart VV or Subpart GGG or NESHAP Subpart V.	
			Light Liquid Service = Pump in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			AMEL = Not using alternate means of emission limitation.	
			Complying With § 60.482-6 = Complying with 40 CFR 60.482-6.	
			Complying With § 60.482-8 = Complying with 40 CFR 60.482-8.	
			Compressors = Compressor in VOC or Wet Gas Service.	
			Enclosed Combustion Device = No enclosed combustion device addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Complying With § 60.482-7 = Complying with 40 CFR 60.482-7.	
			Control Devices Used to Comply With AMEL = No control devices used to comply with AMEL.	
			Flanges and Other Connectors = Flanges or other connectors addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Gas/Vapor Service = Pressure relief device in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Heavy Liquid Service = Pressure relief device in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	
			Reciprocating Compressor in Wet Gas Service = Reciprocating compressor in wet gas service.	
			AMEL = Not using alternate means of emission limitation.	
			Complying With § 60.482-2 = Complying with 40 CFR 60.482-2.	
			Light Liquid Service = Valves in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			AMEL = Not using alternate means of emission limitation.	
			Flare = Flare control device addressed in 40 CFR 60 (NSPS) Subpart KKK.	
			Complying With § 60.482-3 = Complying with 40 CFR 60.482-3.	
			Complying With § 60.482-4 = Complying with 40 CFR 60.482-4.	
			Complying With § 60.482-8 = Complying with 40 CFR 60.482-8.	
			Complying With § 60.482-7 = Complying with 40 CFR 60.482-7.	
FUG	40 CFR Part 60,	600000-001	Construction/Reconstruction/Modification Date = After 8/23/2011.	
	Subpart OOOO		Affected Facility Type = Group of equipment with a process unit, other than a compressor, not subject to 40 CFR Part 60, Subparts VVa, GGG or GGGa.	
PAINT	30 TAC Chapter 115, Surface Coating	R5412-001	Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.	
	Operations		Facility Operations = Other miscellaneous metal parts and products coating.	
			VOC Emission Rate = Uncontrolled emission of less than 550 lb/24-hr period of VOC.	
GRP-INGLY	40 CFR Part 63, Subpart HH	63HH-FL	Alternate Means of Emission Limitation (AMEL) = The EPA Administrator has not approved an alternate means of emission limitation in accordance with 40 CFR § 63.777 or no alternate has been requested.	
			Control Device Type = Flare.	
			Process Vent Control = Process vent is connected to a control device or a combination of control devices through a closed-vent system.	
			Bypass Device = The closed-vent system does not contain bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device.	
			HAP Source = Stationary source or group of stationary sources of HAPs meeting the definition of a major source as defined in 40 CFR § 63.761.	
			Affected Source Type = Large glycol dehydration unit as defined in 40 CFR § 63.761.	
			Sealed Closed Vent System = The closed-vent system contains joints, seams, or other connections that are permanently or semi-permanently sealed.	
			Unsafe to Inspect = No parts of the closed-vent system are designated as unsafe to inspect.	
			Difficult to Inspect = Parts of the closed-vent system are designated as difficult to inspect, as described in 40 CFR § 63.773(c)(6)(i) - (ii).	
GRP-INGLY	40 CFR Part 63, Subpart HH	63НН-ТО	Alternate Means of Emission Limitation (AMEL) = The EPA Administrator has not approved an alternate means of emission limitation in accordance with 40 CFR § 63.777 or no alternate has been requested.	
			Control Device Type = Thermal vapor incinerator.	
			Process Vent Control = Process vent is connected to a control device or a combination of control devices through a closed-vent system.	
			Bypass Device = The closed-vent system does not contain bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device.	
			Control Device Operation = Operates at a minimum temperature of 760 degrees C provided the control device has demonstrated, under 40 CFR §63.772(e), that combustion zone temperature is an indicator of destruction efficiency.	
			HAP Source = Stationary source or group of stationary sources of HAPs meeting the definition of a major source as defined in 40 CFR § 63.761.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Affected Source Type = Large glycol dehydration unit as defined in 40 CFR § 63.761.	
			Performance Test/Design Analysis Exemption = No performance test/design analysis exemption is being utilized.	
			Sealed Closed Vent System = The closed-vent system contains joints, seams, or other connections that are permanently or semi-permanently sealed.	
			Performance Test or Design Analysis = Performance test conducted by manufacturer as specified in 40 CFR § 63.772(h).	
			Unsafe to Inspect = No parts of the closed-vent system are designated as unsafe to inspect.	
			Difficult to Inspect = Parts of the closed-vent system are designated as difficult to inspect, as described in 40 CFR § 63.773(c)(6)(i) - (ii).	

<sup>\* -</sup> The "unit attributes" or operating conditions that determine what requirements apply
\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

#### **NSR Versus Title V FOP**

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification	For initial permit with application shield, can be issued
of an existing facility	after operation commences; significant revisions require
	approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not
	authorize new emissions
Ensures issued permits are protective of the	Applicable requirements listed in permit are used by the
environment and human health by conducting a	inspectors to ensure proper operation of the site as
health effects review and that requirement for	authorized. Ensures that adequate monitoring is in
best available control technology (BACT) is	place to allow compliance determination with the FOP.
implemented.	
Up to two Public notices may be required.	One public notice required. Opportunity for public
Opportunity for public comment and contested	comments. No contested case hearings.
case hearings for some authorizations.	
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources
	identified by the EPA.
Applies to facilities: a portion of site or individual	One or multiple FOPs cover the entire site (consists of
emission sources	multiple facilities)
Permits include terms and conditions under	Permits include terms and conditions that specify the
which the applicant must construct and operate	general operational requirements of the site; and also
its various equipment and processes on a facility	include codification of all applicable requirements for
basis.	emission units at the site.
Opportunity for EPA review for Federal	Opportunity for EPA review, Affected states review, and
Prevention of Significant Deterioration (PSD)	a Public petition period for every FOP.
and Nonattainment (NA) permits for major	
sources.	
Permits have a table listing maximum emission	Permit has an applicable requirements table and
limits for pollutants	Periodic Monitoring (PM) / Compliance Assurance
	Monitoring (CAM) tables which document applicable
	monitoring requirements.
Permits can be altered or amended upon	Permits can be revised through several revision
application by company. Permits must be issued	processes, which provide for different levels of public
before construction or modification of facilities	notice and opportunity to comment. Changes that would
can begin.	be significant revisions require that a revised permit be
2707	issued before those changes can be operated.
NSR permits are issued independent of FOP	FOP are independent of NSR permits, but contain a list
requirements.	of all NSR permits incorporated by reference

#### **New Source Review Requirements**

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The

Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/oldselist/se\_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 37831 Issuance Date: 02/18/2015		
Permits By Rule (30 TAC Chapter 106) for the Application Area		
Number: 106.359 Version No./Date: 09/10/2013		
Number: 106.433	Version No./Date: 09/04/2000	

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

# **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

# Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

# **Compliance Assurance Monitoring (CAM):**

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information				
ID No.: V-4				
Control Device ID No.: TO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)			
Applicable Regulatory Requirement				
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: N/A			
Pollutant: VOC Main Standard: Standard Permit 37831				
Monitoring Information				
Indicator: Combustion Temperature / Exhaust Gas Temperature				
Minimum Frequency: four times per hour				
Averaging Period: one hour				
Deviation Limit: Temperature less than 1400°F in the combustion chamber.				
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for				

Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information				
ID No.: V-4				
Control Device ID No.: FLARE-2	Control Device Type: Flare			
Applicable Regulatory Requirement				
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: N/A			
Pollutant: VOC	Main Standard: Standard Permit 37831			
Monitoring Information				
Indicator: Pilot Flame				
Minimum Frequency: Continuous				
Averaging Period: n/a				
Deviation Limit: No pilot flame.				
Posic of CAM. This widely mosticed and accounted to monitor the flow wilet flows by closed circuit company				

Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.

#### **Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information		
ID No.: 111A		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-001	
Pollutant: NO <sub>X</sub> Main Standard: § 60.332(a)(2)		
Monitoring Information		
Indicator: NOx Concentration		
Minimum Frequency: once every two years		
Averaging Period: n/a		
Deviation Limit: NOx concentration shall not exceed 150 ppmv corrected to 15% O2.		
Racic of monitoring:		

#### Basis of monitoring:

It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.

Unit/Group/Process Information			
ID No.: 111A			
Control Device ID No.: N/A	Control Device Type: N/A		
Applicable Regulatory Requirement			
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-001		
Pollutant: NO <sub>X</sub> Main Standard: § 60.332(a)(2)			
Monitoring Information			
Indicator: Fuel Consumption			
Minimum Frequency: once per week			
Averaging Period: n/a*			
Deviation Limit: Fuel consumption shall not exceed 14,200 SCFH.			
Basis of monitoring:			

It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a correlation between fuel consumption and emission rates. In situations where such a correlation exists, measuring, calculating and recording the fuel consumption rate indicates whether the emission limitation or standard is being met.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information				
ID No.: 112B				
Control Device ID No.: N/A Control Device Type: N/A				
Applicable Regulatory Requirement				
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-005			
Pollutant: NO <sub>X</sub> Main Standard: § 60.332(a)(2)				
Monitoring Information				
Indicator: Fuel Consumption				
Minimum Frequency: once per week				
Averaging Period: n/a*				
Deviation Limit: Fuel consumption shall not exceed 13,600 SCFH.				
Basis of monitoring:				

It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a correlation between fuel consumption and emission rates. In situations where such a correlation exists, measuring, calculating and recording the fuel consumption rate indicates whether the emission limitation or standard is being met.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information				
ID No.: 112B				
Control Device ID No.: N/A	Control Device Type: N/A			
Applicable Regulatory Requirement				
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-005			
Pollutant: NO <sub>X</sub>	Main Standard: § 60.332(a)(2)			
Monitoring Information				
Indicator: NOx Concentration				
Minimum Frequency: once every two years				

Averaging Period: n/a

Deviation Limit: NOx concentration shall not exceed 150 ppmv corrected to 15% O2.

#### Basis of monitoring:

It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.

Unit/Group/Process Information	
ID No.: 113	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-003
Pollutant: NO <sub>X</sub>	Main Standard: § 60.332(a)(2)
Monitoring Information	
Indicator: Fuel Consumption	
Minimum Frequency: once per week	
Averaging Period: n/a*	
Deviation Limit: Fuel consumption shall not o	exceed 14509.80 SCFH.
Basis of monitoring:	ormanaa taata, manufaaturor'a raaammandationa, anginaaring

It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a correlation between fuel consumption and emission rates. In situations where such a correlation exists, measuring, calculating and recording the fuel consumption rate indicates whether the emission limitation or standard is being met.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: 113	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-003
Pollutant: NO <sub>X</sub>	Main Standard: § 60.332(a)(2)
<b>Monitoring Information</b>	
Indicator: NOx Concentration	
Minimum Frequency: once every two years	

Averaging Period: n/a

Deviation Limit: NOx concentration shall not exceed 150 ppmv corrected to 15% O2.

#### Basis of monitoring:

It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.

Unit/Group/Process Information	
ID No.: 120	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-004
Pollutant: NO <sub>X</sub>	Main Standard: § 60.332(a)(2)
Monitoring Information	
Indicator: Fuel Consumption	
Minimum Frequency: once per week	
Averaging Period: n/a*	
Deviation Limit: Fuel consumption shall not o	exceed 12147.06 SCFH.
Basis of monitoring:	ormanaa taata, manufaaturor'a raaammandationa, anginaaring

It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a correlation between fuel consumption and emission rates. In situations where such a correlation exists, measuring, calculating and recording the fuel consumption rate indicates whether the emission limitation or standard is being met.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: 120	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-004
Pollutant: NO <sub>X</sub>	Main Standard: § 60.332(a)(2)
Monitoring Information	
Indicator: NOx Concentration	
Minimum Frequency: once every two years	

Averaging Period: n/a

Deviation Limit: NOx concentration shall not exceed 150 ppmv corrected to 15% O2.

#### Basis of monitoring:

It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.

Unit/Group/Process Information	
ID No.: 170A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-003
Pollutant: NO <sub>X</sub>	Main Standard: § 60.332(a)(2)
<b>Monitoring Information</b>	
Indicator: Fuel Consumption	
Minimum Frequency: once per week	
Averaging Period: n/a*	
Deviation Limit: Fuel consumption shall not e	exceed 41931.37 SCFH.
Basis of monitoring:	ormanaa taata, manufaaturor's raaammandations, ansinaaring

It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a correlation between fuel consumption and emission rates. In situations where such a correlation exists, measuring, calculating and recording the fuel consumption rate indicates whether the emission limitation or standard is being met.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: 170A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-003
Pollutant: NO <sub>X</sub>	Main Standard: § 60.332(a)(2)
Monitoring Information	
Indicator: NOx Concentration	

Minimum Frequency: once every two years

Averaging Period: n/a

Deviation Limit: NOx concentration shall not exceed 168 ppmv corrected to 15% O2.

#### Basis of monitoring:

It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.

Unit/Group/Process Information	
ID No.: AST-813A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-001
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Structural Integrity of the Pine	

Indicator: Structural Integrity of the Pipe

Minimum Frequency: Emptied and degassed

Averaging Period: n/a

Deviation Limit: Not inspecting integrity of fill pipe and recording when vessel degassed, not repairing vessel prior to refill if needed.

#### Basis of monitoring:

Unit/Group/Process Information	
ID No.: AST-813A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-001
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Manitoning Information	

# **Monitoring Information**

Indicator: Record of Tank Construction Specifications

Minimum Frequency: n/a

Averaging Period: n/a

Deviation Limit: No records of tank construction showing specifications for fill pipe or show submerged side fill.

#### Basis of monitoring:

Unit/Group/Process Information	
ID No.: TANK 11	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-001
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Structural Integrity of the Pine	

Indicator: Structural Integrity of the Pipe

Minimum Frequency: Emptied and degassed

Averaging Period: n/a

Deviation Limit: Not inspecting integrity of fill pipe and recording when vessel degassed, not repairing vessel prior to refill if needed.

#### Basis of monitoring:

Unit/Group/Process Information	
ID No.: TANK 11	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-001
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Manitoning Information	

# **Monitoring Information**

Indicator: Record of Tank Construction Specifications

Minimum Frequency: n/a

Averaging Period: n/a

Deviation Limit: No records of tank construction showing specifications for fill pipe or show submerged side fill.

#### Basis of monitoring:

Compliance Review
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>August 25, 2015.</u>
Site rating: <u>17.38 / Satisfactory</u> Company rating: <u>4.12 / Satisfactory</u>
(High $< 0.10$ ; Satisfactory $\ge 0.10$ and $\le 55$ ; Unsatisfactory $> 55$ )
2. Has the permit changed on the basis of the compliance history or site/company rating?
Site/Permit Area Compliance Status Review
1. Were there any out-of-compliance units listed on Form OP-ACPS?No
2. Is a compliance plan and schedule included in the permit?
Available Unit Attribute Forms
OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes

- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- **OP-UA58 Treatment Process Attributes**
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes